

The Honorable Robert J. Bryan

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7                   **UNITED STATES DISTRICT COURT**  
8                   **WESTERN DISTRICT OF WASHINGTON**  
9                   **AT TACOMA**

10 STATE OF WASHINGTON,

11                   Plaintiff,

12                   v.

13 THE GEO GROUP, INC.,

14                   Defendant.

15 Case No. 3:17-cv-05806-RJB

16                   **DECLARATION OF ADRIENNE**  
17                   **SCHEFFEY IN SUPPORT OF**  
18                   **DEFENDANT THE GEO GROUP, INC.'S**  
19                   **OPPOSITION TO PLAINTIFF STATE OF**  
20                   **WASHINGTON'S MOTION TO COMPEL**  
21                   **PARTIALLY UNREDACTED LETTER**  
22                   **AND RELATED FINANCIAL**  
23                   **CALCULATIONS**

24                   I, Adrienne Scheffey, make the following statement under oath subject to the penalty of  
25 perjury pursuant to the laws of the United States and the State of Washington:

26                   1. I one of the attorneys for The GEO Group, Inc. in the above-captioned matter. I  
27 am over the age of eighteen (18), and I am competent to testify in this matter.

28                   2. Prior to filing this declaration, I contacted Carolyn Lee at Veritext to inquire as to  
29 the origin of the "Under Protective Order" designations on the Brian Evans deposition.

30                   3. Initially, Veritext indicated the designations were made by an attorney who was not  
31 involved in this case, but thereafter stated that was in error.

32                   4. Veritext indicated that the designation was based upon the court reporter's  
33 assessment of the colloquy on the record regarding individuals who were not counsel of record  
34 who attended the deposition. Ms. Lee indicated the designations were not made a the request of  
35 counsel.

1       5. I requested that a revised copy be distributed to all counsel of record. Ms. Lee  
2 indicated she would not do so without “an agreement from all parties.”

3       6. Attached are true and correct copies of the following exhibits:

4           **EXHIBIT A:** Attached as Exhibit A are true and correct copies of the deposition of Brian  
5 Evans, taken by Plaintiffs on June 11, 2020.

6           Dated this 2nd day of September, 2020 at Denver, Colorado.

7           Akerman LLP

8           s/Adrienne Scheffey  
9 Adrienne Scheffey (Admitted *pro hac vice*)  
Attorney for Defendant The GEO Group, Inc.

**PROOF OF SERVICE**

I hereby certify on the 2nd day of September 2020, pursuant to Federal Rule of Civil Procedure 5(b), I electronically filed and served the foregoing **DECLARATION OF ADRIENNE SCHEFFEY IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OPPOSITION TO PLAINTIFF STATE OF WASHINGTON'S MOTION TO COMPEL PARTIALLY UNREDACTED LETTER AND RELATED FINANCIAL CALCULATIONS**

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s/ Toni Domres  
Toni Domres